

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal Action No. 04-30046-MAP
	)	
MICHAEL BERGDOLL,	)	
Defendant.	)	
	)	

**MICHAEL BERGDOLL'S MOTION TO EXTEND SURRENDER DATE**

The defendant, Michael Bergdoll ("Bergdoll"), moves the Court to extend the date of his surrender to a Bureau of Prisons facility from February 28, 2007 until March 28, 2007. The basis for this request is that Bergdoll is attempting to enter a drug rehabilitation program while in prison to overcome an addiction to percocet, which Bergdoll has been taking for many years due to chronic back pain for many years. He has become addicted to the drug and would like to enter a rehabilitation program to overcome that addiction. Bergdoll retained Federal Prison Consultants, LLC, to assist him in obtaining a designation to a Federal prison with a rehabilitation program. Federal Prison Consultants informed Bergdoll that they will be able to assist him but need additional time in which to do so. (See Letter dated February 12, 2007 from Federal Prison Consultants, attached as Exhibit A). Therefore, Bergdoll requests that the date of his surrender be extended 30 days.

MICHAEL BERGDOLL

By his attorney,

/s/ Thomas J. Butters

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Dated: February 21, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Thomas J. Butters

Thomas J. Butters